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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 (Magistrate Jan M. Adler)

11 UNITED STATES OF AMERICA,)	CASE NO. 07CR3405
)	07MJ8976
12)	
)	Plaintiff,
13)	NOTICE OF MOTION; MOTION FOR
vs.)	VIDEOTAPE DEPOSITION AND
)	SUBSEQUENT VOLUNTARY DEPORTATION
14)	OF MATERIAL WITNESS; MEMORANDUM
Mario Raymond Fernandez (1),)	OF POINTS AND AUTHORITIES AND
15 Ernesto Flores-Blanco (2),)	DECLARATION OF THOMAS G. GILMORE
)	IN SUPPORT THEREOF
16)	
)	DATE: April 22, 2008
17)	TIME: 10:30 a.m.
Defendants.)	PLACE: Courtroom of Magistrate
)	Jan M. Adler

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19 TO: UNITED STATES ATTORNEY; DEFENDANTS AND THEIR ATTORNEYS OF
20 RECORD:

21 PLEASE TAKE NOTICE that on April 22 ,2008 or as soon thereafter
22 as the matter may be heard, material witness, Alejandro Portillo-
23 Mendoza, will move the Court for an Order that he be subjected to
24 a videotape deposition prior to trial and subsequent voluntary
25 deportation.

26 This motion will be based on 18 U.S.C. 3144 in that the
27 witness' testimony can be adequately secured by deposition and
28 further detention is not necessary to prevent a failure of justice.

1 This motion is further based on this notice of motion, the
2 memorandum of points and authorities and declaration of Thomas G.
3 Gilmore filed herewith, and as such other and further evidence as
4 may be presented at the hearing of the motion.

5 Respectfully submitted,

6 DATED: 4/3/08

/ss/Thomas G. Gilmore
 THOMAS G. GILMORE, Attorney for
 Material Witnesses